My name is Debbie Stein. I am commenting on behalf of the Partnership for America's Children.

We are deeply concerned about the implications of differential privacy for the count of children. It creates significant variation in the quality of data at the local level. Dr Bill O'Hare conducted research on the April 28, 2021 demonstration product and his research indicates that despite the increase of Epsilon, differential privacy is likely to create significant artificial variation in the allocation of funding by geography, particularly for programs that allocate funding directly from national agencies to localities, such as the U.S. Department of Education's Title 1 program for low-income schools and special education funding.

We believe the randomized census results caused by DP could create a major public relations crisis for the Census Bureau if neighboring communities see big differences in their federal fund allocation that have nothing to do with their changing demographics.

As the Census Bureau finalizes the differential privacy methodology, we hope that it will set Epsilon at a level that protects the accuracy of children's data and children's program funding.

Dr O'Hare's research on the demonstration product makes this concern more concrete because it shows that DP creates over 91,000 Census blocks with children under age 18 but no adults in the 2010 census. Blocks with children and no adults is a highly implausible situation and the large number of blocks with children but no adults may undermine confidence in the overall Census results. These implausible results are likely due to children being separated from their parents in DP processing.

We also are very concerned that, in the context of differential privacy, the Census Bureau hasn't yet figured out how to report data that connects children with the adults in the household. Without that connection we can't tell whether the children are living with married parents, single parents, other relatives, or are foster children. These situations are critical for understanding child well-being.

We, of course, are worried about privacy protection in the Census, but we note that the Bureau has not given us any concrete measure for the loss of privacy if epsilon is adjusted to improve accuracy. What would moving from an Epsilon of 12.3 to 15 means in terms of loss of privacy protection? In concrete terms, does an Epsilon of 12.3 mean that individuals working alone on laptops could identify people, or would it take major investments, a lot of computer power, and lots of skilled people? Would the data acquired from the Census files be new data, or data that is already available publicly from other sources? Both these questions affect our view of where to strike the balance between accuracy and privacy.

In summary, analysis of the most recent DP Demonstration Product continues to provide data with unacceptably high errors for children and we are worried that the

production of implausible results will undermine public confidence in the Census and the Census Bureau.